



WASHINGTON, DC

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October 17, 2018

Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: Creation of Interstitial 12.5 kHz Channels in the 800 MHz Band, WP
Docket No. 15-32, RM-11572; Notice of *Ex Parte* Presentation

Dear Ms. Dortch:

On October 16, 2018, Kasey Chow and John Logan of Southern Communications Services, Inc. d/b/a Southern Linc (“Southern Linc”), together with the undersigned, met with Michael Wilhelm and Brian Marengo of the Public Safety and Homeland Security Bureau regarding the Commission’s Draft “Report and Order and Order” in the above-captioned proceeding.¹ During this meeting, we discussed Southern Linc’s recommendation that the Draft Order’s list of new 800 MHz interstitial channels be revised to delete channel 372a from Table 1A of Section 90.617(a)(2) to ensure that there is 1 MHz of separation between public safety systems and high-density ESMR systems in the Southeast, consistent with the Commission’s intent for the 800 MHz band.² Southern Linc also expressed its understanding that a similar revision is not needed for Table 1B of Section 90.617(a)(2) because the Expansion Band in the geographic area covered by Table 1B is only 0.5 MHz, and channel 372a would therefore not fall within the Expansion Band in this area.

¹ / *Creation of Interstitial 12.5 kHz Channels in the 800 MHz Band Between 809-817/854-862 MHz*, WP Docket No. 15-32, RM-11572, Public Draft, Report and Order and Order, FCC-CIRC1810-03 (Oct. 2, 2018) (“Draft Order”).

² / *See* Letter from David D. Rines, Counsel to Southern Linc, to Marlene H. Dortch, Secretary, FCC, WP Docket No. 15-32, RM-11572 (filed Oct. 11, 2018). *See also* Comments of Southern Linc, WP Docket No. 15-32, RM-11572 (filed May 11, 2015); Southern Linc Notice of *Ex Parte* Presentation, WP Docket No. 15-32, RM-11572 (filed June 18, 2015); Southern Linc Notice of *Ex Parte* Presentation, WP Docket No. 15-32, RM-11572 (filed June 30, 2016).



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Pursuant to Section 1.1206 of the Commission's Rules, this letter is being filed electronically via the Electronic Comment Filing System in the above-referenced proceeding.

Respectfully submitted,

/s/ David D. Rines

David D. Rines

Counsel to Southern Linc

cc: Michael Wilhelm
Brian Marengo